

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

LANDMARK LEGAL FOUNDATION

Plaintiff,

v.

ENVIRONMENTAL PROTECTION AGENCY

Defendant.

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Civil Action No. 1:12-cv-01726-RCL

**MOTION FOR ADMISSION
PRO HAC VICE OF MATTHEW C. FORYS**

Plaintiff Landmark Legal Foundation, by and through the undersigned counsel of record, respectfully moves for the admission *pro hac vice* of Matthew C. Forys. Per Local Civil Rule 83.2(d), Plaintiff attaches the Declaration of Matthew C. Forys to this motion.

Pursuant to Local Rule 7(m) and its required conference, counsel for Defendant does not oppose the motion.

Dated: April 3, 2014

Respectfully submitted,

/s/

Michael J. O'Neill #478669
Landmark Legal Foundation
19415 Deerfield Avenue, Suite 312
Leesburg, VA 20176
703-554-6105

CERTIFICATE OF SERVICE

Undersigned counsel hereby certifies that a true and accurate copy of the foregoing Motion for Admission Pro Hac Vice was filed electronically with the Court by using the CM/ECF system on this 3rd day of April, 2014. Parties that are registered CM/ECF users will be served by the District Court's CM/ECF system.

/s/ Michael J. O'Neill
Michael J. O'Neill
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
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Civil Action No. 1:12-cv-01726-RCL

ENVIRONMENTAL PROTECTION AGENCY

Defendant.

DECLARATION OF MATTHEW C. FORYS

I, Matthew C. Forys, declare as follows:

1. I am the Assistant General Counsel of Landmark Legal Foundation, a public interest law firm.
2. My office address is 19415 Deerfield Ave, Leesburg, VA 20176. My office telephone number is 703-554-6100.
3. I am a member in good standing of the Bars of New York, New Jersey and Virginia.
4. I certify that I have not been disciplined by any bar.
5. I have not been admitted *pro hac vice* in this Court within the last two years.
6. I am not engaged in the practice of law from an office located in the District of Columbia.
7. I am not a member of the District of Columbia Bar, nor do I have a pending application for membership in the District of Columbia Bar.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 3, 2014

/S/ _____
Matthew C. Forsys

Upon consideration of the motion of Plaintiff, Landmark Legal Foundation, for admission *pro hac vice* for Matthew C. Forys, Esq., any opposition thereto, and the record in this case, it is this _____ day of _____, 2014, ORDERED that the motion is hereby GRANTED.

Dated: _____